

LEE, LILY

From: Herrera, Angeles
Sent: Tuesday, December 26, 2017 10:55 AM
To: LEE, LILY
Subject: Fwd: HP

Sent from my iPhone

Begin forwarded message:

From: Herrera.Angeles@epa.gov
Date: December 26, 2017 at 10:36:04 AM PST
To: "thomas. macchiarella" <thomas.macchiarella@navy.mil>, Lawrence Lansdale <lawrence.lansdale@navy.mil>, "kimberly. ostrowski" <kimberly.ostrowski@navy.mil>
Cc: John Chesnutt <Chesnutt.John@epa.gov>
Subject: HP

Hi Kim, Lawrence, and Thomas,

Thank you for traveling to San Francisco to informally discuss concepts for a path forward. I also appreciate the follow-up conference call with Thomas and the team.

I had promised to raise concerns as quickly as possible. While I haven't consulted with our State regulatory partners, I have had discussions with my team and identified some general concerns. For a prove-out to be successful in demonstrating the accuracy of the Navy's conceptual site model, we need to see full excavation and scanning at a sufficient and representative number of survey units. Any plan must also address potential contamination at depth and worker exposure. EPA national policy and established practice nationwide is to excavate all material found above established cleanup goals. It is also established practice to use the mean to determine reference background for radiological sites.

As we raised at our meeting, a decision tree for multiple scenarios for sampling results will ensure prior agreement on contingency plans. Finally, as always, for any significant and fundamental ROD changes, post ROD change documentation and a meaningful public involvement process will be necessary for full transparency and compliance with CERCLA.

We will continue to discuss the concepts with our technical, legal, and management team and will raise any new concerns that arise. However, I realize that we are still missing information on the specifics of your proposal. I encourage you to share as much detail as possible so we can better evaluate your proposal. We look forward to continue working with the Navy to scope out and begin the sampling component of the radiological assessment effort as soon as possible. Please call me at 415-972-3144 or John at 415-972-3005 if you would like to discuss any of these further.

Angeles